



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

SEP 23 2011

PROMPT REPLY NECESSARY
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Atlantic Richfield Company
c/o CT Corporation System
120 South Central Avenue
Clayton, Missouri 63105

Dear Sir/Madam:

Re: Request for Information Pursuant to Section 104(e) of CERCLA for
Former Lyons Diecasting Facility Site, Buckner, Missouri

The U.S. Environmental Protection Agency seeks the cooperation of the Atlantic Richfield Company (Atlantic Richfield) in providing information and documents relating to the Former Lyons Diecasting Facility Superfund Site, Buckner, Missouri (Site). The Site is located in Section 18, Township 50 North, Range 29 West, Jackson County, Missouri, commonly known as 2300 North Holly Road, Buckner, Missouri. A map outlining the Site is enclosed.

The EPA has information that the Site was once the location of a pipeline compressor station. According to Jackson County, Missouri deed records (Enclosure E), Sinclair Refining Company owned the Site from 1936 to 1950. According to corporate records from the Missouri Secretary of State, Atlantic Richfield Company is the successor through mergers to Sinclair Refining Company. In 1950, the Site was deeded to Sinclair Pipeline Company.

Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9601 et. seq., the EPA has documented the release or threatened release of hazardous substances, or pollutants, or contaminants at the Site.

Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), provides the EPA the authority to require information from any party who may have information relevant to the release or threatened release of hazardous substance, pollutants or contaminants. This section also provides the EPA the authority to require information from any party relating to the ability of a person to pay for or to perform a cleanup.

Pursuant to Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), the EPA has broad information gathering authority which allows EPA to require persons to furnish information or documents relating to the identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed at a vessel or facility or transported to a vessel or facility, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility, and ability of a person to pay for or to perform a cleanup.

40353049



Superfund

While the EPA seeks your cooperation in this investigation, compliance with this Information Request is required by law. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes the EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to requests for submissions of required information.

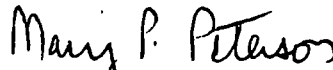
Some of the information the EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish the EPA to treat the information confidentially, you must advise the EPA of that fact by following the procedures outlined in Enclosure B. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et. seq.

Instructions on how to respond to the questions in this document are described in Enclosure B. The instructions and definitions must be followed in responding to this information request. Your response to this Information Request must be mailed within **30 days** of your receipt of this letter to:

Robert Richards, Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 7
901 North 5th Street
Kansas City, Kansas 66101
(913) 551-7502

If you have questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of the EPA's investigations please contact Michael B. Davis, On-Scene Coordinator, at (913) 551-7328. However, if you have any legal questions or specific questions about this Information Request please contact Robert Richards, Assistant Regional Counsel, at (913) 551-7502. We look forward to your prompt response and appreciate your assistance in this matter.

Sincerely,



Mary Peterson, Chief
Planning and Preparedness South Section
Emergency Response and Removal South Branch
Superfund Division

Enclosures: A - Instructions
B - Definitions
C - Questions
D - Site Map
E - Deeds

ENCLOSURE A

INSTRUCTIONS

1. Please provide a complete and separate response to each question and precede each answer with the number of the question to which it corresponds.
2. For every question contained herein, identify all persons consulted in the preparation of responses.
3. For every question contained herein, identify all documents consulted, examined, or referred to in the preparation of the response that contain information responsive to the question and provide true and accurate copies of all such documents.
4. If you currently lack information to answer any question completely, provide the responsive information currently available, efforts which you intend to make to secure the information currently unavailable, and the date you anticipate receiving the information currently unavailable.
5. **If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA.** Moreover, should you find at any time after the submission of this response that any portion of the submitted information is incomplete, false, or misrepresents the truth, you must notify the EPA thereof as soon as possible.
6. For each question contained herein, if the information responsive to the question is not in your possession, custody or control, then identify the persons from whom such information may be obtained.
7. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify such persons.
8. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
9. The information requested herein must be provided notwithstanding its possible characterization as business confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. § 9604(e)(7)(E) and (F), and 40 C.F.R. 2.203(b), by attaching to such information at the time it is submitted a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary" or "company confidential." Information covered by such a claim will be disclosed by the EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you.

8. The term "waste" or "wastes" means trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

9. The term "arrangement" means every separate contract or other agreement between two or more persons, whether written or oral.

ENCLOSURE C

QUESTIONS

1. Identify the person(s) answering these questions.
2. During what period of time did you own the Site?
3. Describe the details of your acquisition of the real property, personal property, and/or business operations at the Site. Provide a copy of the purchase document or documents showing what aspects of the former operation you purchased and from whom.
4. During what period of time did you operate at the Site?
5. Where on the property did you operate at the Site? (Show on enclosed map.)
6. What type of operations did you perform at the Site? Describe these operations in detail, including types of and name of manufacturer of machinery and operating plant used.
7. Did you ever have any above or below ground tanks at the Site? If so, describe what was stored in the tanks, the size of the tanks, and the disposition of the tanks, contents of the tanks, and any cleanup activities related to the tanks.
8. Did you ever use polychlorinated biphenyls (PCBs) at the Site? If so, describe how the PCBs were used, including mixtures with any other substances.
9. If PCBs were used at the Site, describe how the PCBs were disposed.
10. Provide copies of documents in your possession related to the operations at the Site involving PCBs or tanks, including, but not limited to licenses, permits, and correspondence.
11. When was the Site sold by you and to whom? Provide documentation on the sale of the Site.
12. What is your relationship to Sinclair Pipe Line Co., a Delaware corporation that owned the Site from December 31, 1950, to June 1, 1953? Describe the corporate history of mergers or acquisitions between you and Sinclair Pipe Line Co.
13. Have you ever been deemed a CERCLA potentially responsible party or RCRA responsible party at any other compressor or pipeline site where PCBs were used? If so, describe name, location, and details of your responsibility at the site.
14. Did you conduct any environmental investigation of the Site before your purchase of the Site or at any other time? If so, provide a copy of the results of this investigation.
15. Identify any individuals who may have knowledge of any facts called for in this information request and include a brief description of the general area of knowledge for each individual.

16. Describe all records currently or formerly in your possession relating to the information requested in this information request. Identify the current custodian of these records and the location of the records. If any of these records have been destroyed, state the date and methods of such destruction.

17. Identify the person to whom EPA should address any future correspondence to you regarding this matter.

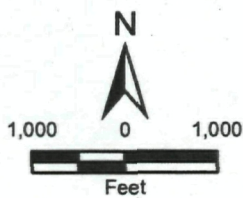
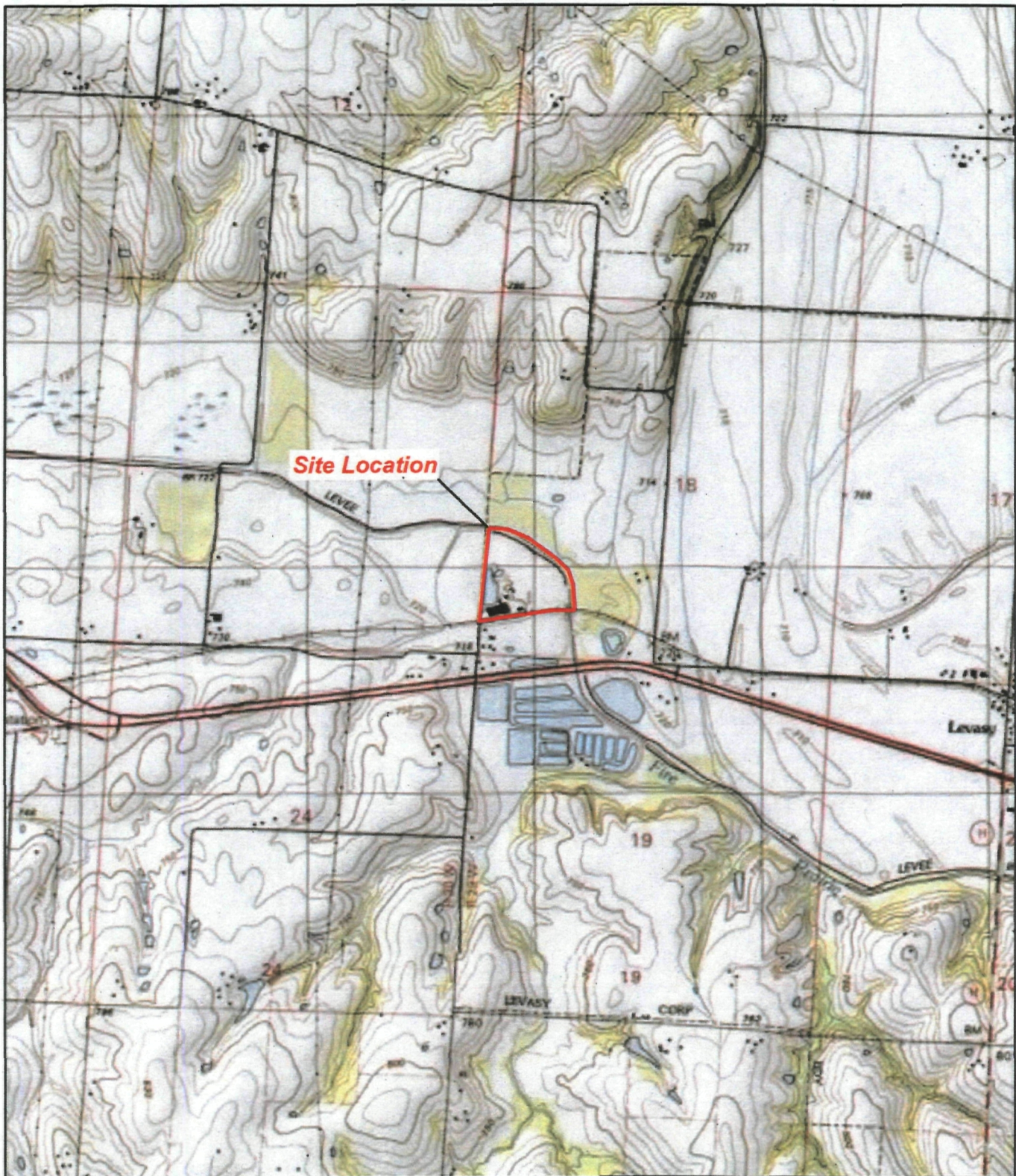
18. If you are withholding any information or documents on the basis of attorney work-product, attorney client privilege or any other privilege, provide a complete privilege log identifying each piece of information or document believed to be privileged, and the basis of the privilege, identify the individuals who made such determinations and the information that each individual specifically reviewed; if only portions of documents are claimed as privileged, provide the document with the privileged portion redacted.

19. Identify the locations where you have searched for records. Identify any archives where records or documents are located that pertain to matters inquired about in this Information Request and describe briefly the kinds of records that each archive is expected to have and provide the name, address, telephone number and e-mail address of the Point of Contact for permission to access these records or documents.

20. If you have any reason to believe that there may be persons able to provide a more detailed or complete response to any questions contained herein, or who may be able to provide additional responsive documents, identify such persons, how they may be contacted, and the additional information or documents that they may have.

ENCLOSURE D

SITE MAPS



Former Lyons Diecasting Company Site
Buckner, Missouri

Figure 1
Site Location Map



X:\2000\06197\0000\poly\shaded\Figure1_081817.mxd

Source: USGS Buckner, MO 7.5 Minute Topo Quads, 1997

Date: 8/25/11

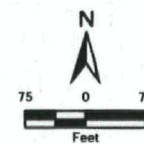
Drawn By: Gustavo Orozco

Project No: X0004.L 10.0197.000



Legend

- Property boundary
- Building boundary
- Pond/Lagoon boundary
- Propane tank
- Waste pit boundary



Source: GlobeXplorer Aerial Imagery, DigitalGlobe, 2008; Missouri Department of Natural Resources, Figure 6, 2009.

Former Lyons Diecasting Company Site
Buckner, Missouri

Figure 2
Site Layout Map

TETRA TECH EM INC.

Date: 09/09/10 Drawn By: Gwynne O'Brien Project No: 10004.1, 10.01.07.2009

Former Lyons Diecasting Facility Site PRP Search Report
Attachment B: Chain of Title / Deeds

617 / 405

Quarter, thence North 46 1/2 rods more or less, to the place of beginning, and containing 0.35 acres, more or less.

Reserving, however, to Serena M. Pendleton and her assigns, the right of way 20 feet wide across the North end of said tract, to be used for passage way.

TO HAVE AND TO HOLD the above described premises together with all and singular, the rights and appurtenances thereto in anywise belonging, including all property and buildings, structures, fixtures and improvements of the Grantor thereon, or held or used in connection therewith, unto the said Grantee, its successors and assigns forever.

IN WITNESS WHEREOF said Sinclair Prairie Pipe Line Company has caused these presents to be executed by its proper officers thereunto duly authorized and its corporate seal to be affixed hereunto, this Aug. 31 1936

(CORPORATE SEAL) SINCLAIR PRAIRIE PIPE LINE COMPANY

ATTEST:
B.B. Hanna
Secretary.

By J.R. Manion
President.

STATE OF KANSAS }
 } ss.
MONTGOMERY COUNTY }

On this Aug. 31 1936, before me, the undersigned, a Notary Public in and for said County and State, personally appeared J.R. MANION, to me personally known to be the President of Sinclair Prairie Pipe Line Company, a Delaware corporation, and who, being by me duly sworn, did say that he is President of Sinclair Prairie Pipe Line Company, the Grantor in the foregoing conveyance and that the seal affixed to the foregoing instrument is the corporate seal of said corporation, and that said instrument was executed, signed and sealed in behalf of said corporation by authority of its Board of Directors; and the said J.R. MANION, being personally known to me to be the identical person who subscribed the name of the maker thereof, and his own name to the foregoing instrument as its President, duly acknowledged to me that he executed, signed, sealed and delivered the said instrument as his free and voluntary act and deed, and as the free and voluntary act and deed of said corporation, for the uses and purposes and for the consideration therein set forth.

Witness my hand and official seal.

My commission expires Mar 7 1936 (LS) L.L. Freeman
Notary Public.

Filed for record and duly recorded in my office this 5 day of October A.D. 1936, at 8 o'clock 30 minutes A.M.

JOSEPH S. CRISP RECORDER
By C.R. GILLESPIE DEPUTY

372476

D E E D

P 24 Buckner

KNOW ALL MEN BY THESE PRESENTS:

That Sinclair Prairie Pipe Line Company, a Delaware corporation, (formerly Sinclair Texas Pipe Line Company) Grantor herein, in consideration of the sum of One (\$1.00) Dollar and other good and valuable consideration, the receipt of which is hereby acknowledged, does

ENCLOSURE E

Former Lyons Diecasting Facility Site PRP Search Report
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hereby grant, bargain, sell, and convey unto SINGLAIK REFINING COMPANY, a Maine corporation, Grantee herein, its successors and assigns, the following described properties situated in the County of Jackson, State of Missouri, to-wit:

All that part of the Southwest quarter (SW $\frac{1}{4}$) of Section Eighteen (18), Township 50 North, Range 29 West, described as follows:

Beginning at the Southwest corner of said Section 18, running thence North along the West line of said Section 18, four hundred seven and six tenths (407.6) feet to a point where the South line of the right of way of The Missouri Pacific Railway intersects the West line of said Section 18; thence along the South line of said Missouri Pacific Railway north 71° and 45' East 217.6 feet to an iron pipe in the railway fence; thence south and parallel with the West line of said Section 18, 451.75 feet to the South line of said Section 18; thence West along the South line of said Section 18, 207.7 feet to the point of beginning, and containing Two (2) acres, more or less.

Also, commencing at a point in the West line of the Southwest Quarter (SW $\frac{1}{4}$) of said Section 18 where the North line of the right of way of The Missouri Pacific Railway Company intersects the said West line of said Section 18; thence North along said West line of Section eighteen, 950 feet to a point in the hedge; thence North 71° 45' East, 704.3 feet to an iron pipe set in the ground; thence South and parallel with the West line of said Section Eighteen, 950 feet to the North line of The Missouri Pacific right of way, to a point where an iron pipe is set in the railway fence; thence Southwesterly along the North line of said Missouri Pacific right of way, 704.3 feet to the point of beginning, and containing 15 acres, more or less.

Said tracts containing in all Seventeen (17) acres, more or less.

Also a tract of land described in notes and bounds as follows:

Beginning at a point 516 feet North of the Southeast corner of Section Thirteen (13) Twp. Fifty (50) of Range Thirty (30), thence North along section line; 630 feet to green hedge tree, thence East 16 $\frac{1}{2}$ feet; thence South 833 feet to Missouri Pacific Railroad; thence Easterly along said Right of Way 16 $\frac{1}{2}$ feet to place of beginning.

Except tract conveyed by Sinclair Prairie Pipe Line Company to C. Gross by Deed dated October 31, 1934, and described as follows:

Beginning at an iron pin in the South line of Section 18, Township 50 North, Range 29 West of the Fifth principal meridian, Jackson County, Mo., which point is forty two and three tenths feet east of the southwest corner of said section 18, thence east along the south line of said section 18 a distance of one hundred sixty and two tenths (160.2) feet to an iron pin, thence north parallel to the west line of said section 18 a distance of one hundred forty two (142) feet to an iron pin, thence west parallel to the south line of said section 18 a distance of one hundred sixty two (162) feet to an iron pin, thence in a southerly direction a distance of one hundred forty two (142) feet to place of beginning, containing 52/100 acres more or less.

TO HAVE AND TO HOLD the above described premises together with all and singular the rights and appurtenances thereto in anywise belonging, including all personal property and buildings, structures, fixtures and improvements of the Grantor therein, or held or used in connection therewith, unto the said Grantee, its successors and assigns forever.

IN WITNESS WHEREOF said Sinclair Prairie Pipe Line Company has caused these presents to be executed by its proper officers thereunto duly authorized and its corporate seal to be affixed herunto, this Aug. 11, 1936.

(CORPORATE SEAL) SINGLAIK PRAIRIE PIPE LINE COMPANY,

ATTEST: S. B. Hanna, Secretary.

By J. R. Hanson, President.

Former Lyons Diecasting Facility Site PRP Search Report
Attachment B: Chain of Title / Deeds

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Internal Revenue
Cancelled 8-31-36
TTL Co.
\$23.50

STATE OF KANSAS
MONTGOMERY COUNTY, ss. On this Aug 31 1936, before me, the undersigned, a Notary Public,
in and for said County and State, personally appeared J.R. MANION, to me personally known to
be the President of Sinclair Prairie Pipe Line Company, a Delaware corporation, and who, being
by me duly sworn, did say that he is President of Sinclair Prairie Pipe Line Company, the
grantor in the foregoing conveyance and that the seal affixed to the foregoing instrument
is the corporate seal of said corporation, and that said instrument was executed, signed and
sealed in behalf of said corporation by authority of its Board of Directors; and the said
J.R. MANION, being personally known to me to be the identical person who subscribed the name
of the maker thereof, and his own name to the foregoing instrument as its President, duly
acknowledged to me that he executed, signed, sealed and delivered the said instrument as his
free and voluntary act and deed, and as the free and voluntary act and deed of said corpora-
tion, for the uses and purposes and for the consideration therein set forth.

Witness my hand and official seal.

My commission expires Mar 7 1938 (LS) L.L. Freeman
Notary Public.

Filed for record and duly recorded in my office this 5 day of October A.D., 1936, at
6 o'clock 40 minutes A.M.

JOSEPH S. CRISP RECORDER

By C.R. GILLERVIS DEPUTY

372464 Affidavit as to facts affecting title to the Southeast of the southwest quarter
of the northeast quarter; the north 30 acres of the south 60 acres of the east half of the
southwest quarter; the northwest quarter of the northeast quarter of the southeast quarter;
and the south 60 acres of the west half of the southeast quarter; All in section 18, township
49, range 29, in Jackson County, Mo.

State of Missouri,
County of Jackson, ss.

Wm. R. Hall, of lawful age, being duly sworn deposes and says; that he was intimately
acquainted with John M. Klots and Jennie M. Klots, his wife, during their life-time, who lived
on and owned the above described land for more than 30 years during all of said time they
were in notorious and peaceable possession thereof; that the said Jennie M. Klots, died on or
about March 13th, 1913; that the said Jennie M. Klots was the wife of said John M. Klots at
the date of her death; that he knows that the said John M. Klots is one and the same person
as John Klots named as grantor in a Guardian's Deed recorded in Book 198 at page 17; also
named as grantor in warranty deed recorded in Book 197 page 355, as John Klots; said deeds
being of record in the office of the Recorder of Deeds for Jackson County, at Independence,
Missouri; that John B. Klots is the only child and heir of the said John M. and Jennie M. Klots.

Wm. R. Hall

Subscribed and sworn to before me this 11th day of April, 1925.

My term expires March 27th, 1927 (LS) Paul S. Cobb
Notary Public, Jackson County, Missouri.

Filed for record and duly recorded in my office this 5 day of October A.D. 1936.

Former Lyons Diecasting Facility Site PRP Search Report
Attachment B: Chain of Title / Deeds

57742103

574343

DEED

KNOW ALL MEN BY THESE PRESENTS:

That on this day of January 22, 1974, Shaker Building Company, a Maine corporation, Grantor herein, in consideration of the sum of ONE HUNDRED DOLLAR and other good and valuable consideration, the receipt of which is hereby acknowledged, have hereby granted, conveyed, sold, and conveyed unto:

SHAKER PIPE LINE COMPANY, a Delaware corporation,

Grantee herein, its successors and assigns, the following described properties situated in the County of
Maine, State of Maine, to-wit:

All that part of the Southwest quarter (SW) of Section Eighteen (18), Township 30 North, Range 20 West, described as follows:

Beginning at the Southwest corner of said Section 18, running thence North along the West line of said Section 18, four hundred seven and six tenths (407.6) feet to a point where the South line of the right of way of the Missouri Pacific Railway intersects the West line of said Section 18, thence along the South line of said Missouri Pacific Railway north 71° and 45' East 217.6 feet to an iron pipe in the railway fence; thence south and parallel with the West line of said Section 18, 101.75 feet to the South line of said Section 18; thence West along the South line of said Section 18, 207.7 feet to the point of beginning, and containing 10 acres, more or less.

Also, commencing at a point in the West line of the South-east Quarter (SE) of said Section 18 where the North line of the right of way of the Missouri Pacific Railway Company intersects the said West line of said Section 18; thence North along said East line of said Section 18, 950 feet to a point in the hedge; thence North 71° 45' East, 704.3 feet to an iron pipe set in the ground; thence South and parallel with the West line of said Section 18, 950 feet to the North line of the Missouri Pacific right of way; thence West along the North line of said right of way, 704.3 feet to the point of beginning, and containing 15 acres, more or less.

Said tract containing in all Section (17), above, more or less.

Also a tract of land described as follows:

Beginning at a point 375 feet North of the Southwest corner of Section Eighteen (18) Twp. 30 N. R. 20 W. of Range Thirty (30), thence North along section line 630 feet to green hedge tree, thence West 145 feet; thence South 390 feet to Missouri Pacific Railway; thence Easterly along said Right of way 145 feet to place of beginning.

Saught tract conveyed by Shaker Pipe Line Company to C. Green by Deed dated October 21, 1974, and described as follows:

Beginning at an iron pipe in the South line of Section 18, Township 30 North, Range 20 West of the Fifth Principal Meridian, Jackson County, Me. which point is forty two and three tenths feet east of the Southwest corner of said Section 18, thence east along the South line of said Section 18 a distance of one hundred sixty and two tenths (160.2) feet to an iron pipe, thence north parallel to the South line of said Section 18 a distance of one hundred forty two (142) feet to an iron pipe, thence west parallel to the South line of said Section 18 a distance of one hundred sixty two (162) feet to an iron pipe, thence in a southerly direction a distance of one hundred forty two (142) feet to place of beginning, containing 25/100 acres, more or less.

TO HAVE AND TO HOLD the above described premises, together with all and singular the rights and appurtenances thereto in anywise belonging, unto the said Grantee, its heirs, assigns, successors and assigns forever, including all present and future taxes, charges, interest and improvements of the Grantee (present, or held or used in taxation herewith, unto the said Grantee, its successors and assigns, forever.

IN WITNESS WHEREOF, said Shaker Building Company has caused these presents to be executed by its proper officer, Shaker Building Company, and its corporate seal to be affixed herewith, as of the day and year first above stated.

ATTORNEY

[Signature]
JAN 22 1974
MAINE

SHAKER PIPE LINE COMPANY

[Signature]
Vice President
S. 174-5646103

Former Lyons Diecasting Facility Site PRP Search Report
Attachment B: Chain of Title / Deeds

89700103

STATE OF MISSOURI
SUBSTITUTION OF DEED

On this 25th day of December, 1988, Robert W. and Mary Feltz, R. F. Feltz

It and for said Robert W. Feltz, personally appeared, R. F. Feltz, being personally known to me to be the husband of Mary Feltz, a Missourian, and who, after he and Mary Feltz, the President of Feltz Building Company, Inc. (the Company) executed this deed, did deliver to the County Clerk of the County of Jackson, Missouri, the original of this deed, and that said instrument was accepted, signed and sealed in behalf of said corporation by R. F. Feltz.

Witness my hand and seal of office this 25th day of December, 1988, at Jackson, Missouri.

CLERK OF THE COUNTY OF JACKSON, MISSOURI

25 DEC 1988

TAKEN FOR RECORD AND DEED FILED IN MY OFFICE THIS 25th DAY OF DECEMBER, 1988, AT JACKSON, MISSOURI.

JAMES J. BAUGHN, Clerk of the County of Jackson, Missouri

874288

Missouri Warranty Deed

Said Instrument, Made on the 11th day of January A.D. One Thousand Nine Hundred and Fifty One by and between

Earl E. Hendrix and Helen E. Hendrix, husband and wife,
of the County of Jackson, State of Missouri part 1st of the first part, and
Arthur L. Nelson and Irene E. Nelson, husband and wife,
of the County of Jackson, State of Missouri part 1st of the second part.

WITNESSETH: THAT THE SAID PARTIES OF THE FIRST PART, in consideration of the sum of One Dollar and other valuable consideration